



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Charles Hoppin
Board Chair
State Water Resources Control Board
PO BOX 100
Sacramento, CA 95812-0100



Dear Mr. Hoppin,

The U.S. Environmental Protection Agency (EPA) supports the Los Angeles Regional Water Quality Control Board's proposed basin plan amendment (BPA) to establish Total Maximum Daily Loads (TMDLs) for pesticides and PCBs in Machado Lake. The proposed TMDLs meet all federal regulatory requirements.

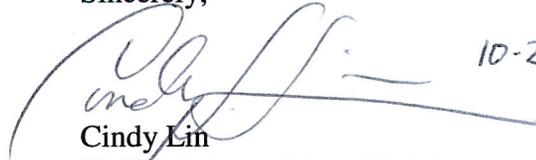
EPA reviewed the proposed BPA and Staff Report during the consideration of the TMDL by the Los Angeles Regional Water Quality Control Board (Resolution No. R10-008), and supported the adoption of the TMDL with recommended modifications (Letter dated June 1, 2010). In response to our comment, the staff report and BPA were appropriately amended to include an explicit 10% margin of safety to ensure attainment of the fish tissue numeric targets.

EPA concurs with the selection of the human health California Toxics Rule (CTR) criteria as TMDL water targets. Since the human health CTR criteria are more stringent than the CTR aquatic life criteria, they will protect both human health and aquatic life. TMDL targets are also identified for sediment and fish tissue, consistent with EPA guidance for addressing narrative water quality standards. EPA supports the selection of Threshold Effect Concentration (TEC) guidelines as numeric sediment targets and OEHHA Fish Contaminant Goals (FCG) as numeric fish tissue targets. In addition, we find the concentration-based wasteload allocations are consistent with EPA guidance and other similar TMDLs adopted in the state.

EPA reviewed the proposed pesticides and PCBs TMDLs and found reasonable scientific analysis for addressing the Chema, chlordane, DDT, dieldrin, and PCBs impairments in Machado Lake. We also appreciate the inclusion of specific actions and milestones in the associated implementation plan to provide greater clarity of implementation expectations for all stakeholders.

We urge the State Board to approve the TMDLs to meet California's TMDL commitments and to enable EPA to meet its requirements under the consent decree (*Heal the Bay v. Browner, C. 98-48 25 SBA*, March 22, 1999). If you have any questions, please contact me at (213) 244-1803.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cindy Lin', is written over a horizontal line.

10-26-2011

Cindy Lin
TMDL liaison, Water Division

cc: Sam Unger, Los Angeles RWQCB